

UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

MDL No. 3047

THIS DOCUMENT RELATES TO:
ALL ACTIONS

Case Nos.: 4:22-md-03047-YGR-PHK

**[PROPOSED] ORDER RE JOINT
DISCOVERY LETTER BRIEF ON
WHETHER YOUTUBE MUST
PRODUCE DOCUMENTS
REGARDING ITS CORPORATE
STRUCTURE AND HISTORICAL
VERSIONS OF POLICIES
CONCERNING ITS COMPLAINT
PROCESS (DKT. 1305)**

Judge: Hon. Yvonne Gonzalez Rogers
Magistrate Judge: Hon. Peter H. Kang

1 Pursuant to oral argument heard during the Court's November 21, 2024 Discovery Management
2 Conference, the Court hereby ORDERS the following regarding PI/SD Plaintiffs and Defendants
3 YouTube, LLC and Google, LLC (together, "YouTube"), (collectively, the "Parties"), Joint Letter
4 Brief on Whether YouTube Must Produce Documents Regarding its Corporate Structure and
5 Historical Versions of Policies Concerning its Complaint Process (Dkt. 1305).

6 1) With respect to RFP No. 62:

7 a) As to the portion of the request that seeks crisis management policies for responding
8 to investigations, lawsuits, and media inquiries regarding the safety of minors,
9 including documents explicitly discussing said policies, YouTube is directed to
10 serve a supplemental response stating that no responsive non-privileged crisis
11 management policies exist, if accurate based on YouTube's reasonable
12 investigation. YouTube is otherwise directed to produce non-privileged responsive
13 policies.
14 i) To the extent responsive documents have already been produced, YouTube
15 is directed to identify by production date the productions containing policies
16 responsive to RFP No. 62.

17 b) As to the portion of the request which seeks documents showing the methods of
18 communication regarding crisis management, the Parties are directed to further
19 meet and confer.

20 2) With respect to RFP No. 69, YouTube is directed to serve a supplemental response stating
21 that there are no responsive policies describing how the general compensation policies
22 previously produced should be applied to the teams responsible for youth safety in
23 particular, if accurate based on YouTube's reasonable investigation. YouTube is otherwise
24 directed to produce such non-privileged responsive policies.

25 3) With respect to RFP Nos. 71, 72, 76 and 79, to the extent responsive policies have already
26 been produced, YouTube is directed to identify by production date the productions
27 containing policies responsive to RFP Nos. 71-72, 76, and 79. Plaintiffs may reasonably
28 request historical versions of specific policies produced in response to these requests and

1 for which such historical versions are relevant and proportional to the needs of the case.

2 The parties are directed to meet and confer in response to any such reasonable request.

3 4) As to each request, to the extent YouTube withholds any responsive document on the basis
4 of any claim of privilege, YouTube must log those documents in accordance with the
5 Privilege Log Protocol (Dkt. No. 740).

6

7 **IT IS SO ORDERED**

8

9 DATED: December 27, 2024



10

11 Hon. Peter H. Kang
United States Magistrate Judge

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13

14 DATED: December 27, 2024

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7 DATED: December 27, 2024

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ATTESTATION

I, Ellyn Hurd, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1(i)(3), that the concurrence to the filing of this document has been obtained from each signatory hereto.

5 || Dated: December 27, 2024

By: /s/ Ellyn Hurd
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